

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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Heather Nelson  
516 Columbus Street  
Sun Prairie, WI 53590-2306

Plaintiff

v.

Civil No.: 3:11-cv-307

Santander Consumer USA, Inc.  
8585 N. Stemmons Freeway 1100N  
Dallas, TX 75247,

Patrick K. Willis Co., Inc.,  
d/b/a American Recovery Service  
5118 Robert Mathews Parkway  
El Dorado Hills, CA 95762, and

AssetsBiz Corp.  
d/b/a ABC Recovery  
180 Chicago Street  
Cary, IL 60013,

Defendants.

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Plaintiff's Unopposed Motion to File an Amended Complaint

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Plaintiff Heather Nelson comes before this Court and states as follows:

1. On April 26, 2011, Plaintiff Heather Nelson filed this action, suing Santander Consumer USA, Inc., (Santander) for alleged violations of the Fair Debt Collection Practices Act, the Wisconsin Consumer Act, and the Federal Telephone Consumer Protection Act.

2. During October and November 2011, Santander provided additional discovery as to the identity of the firms involved in various attempted repossession and

collection activities that had previously been pled in the original complaint. The amended complaint serves primarily to add those two parties, Patrick K. Willis Co., Inc. and AssetsBiz Corp., to the action. The amended complaint is attached.

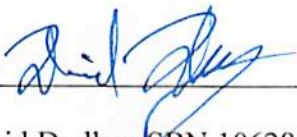
3. Defendants would suffer no prejudice from the amendment of Nelson's complaint. The factual allegations have not changed significantly from the original complaint, other than to add the identity of the repossession companies involved. Nelson would sue the additional parties in a separate action if they were not added to this action.

4. Pursuant to Fed. R. Civ. P. 15(a)(2), Nelson's counsel has conferred with Santander's counsel, who has indicated that Santander does not object to this motion.

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For the foregoing reasons, this Court should grant Plaintiff Nelson's unopposed motion for leave to amend the complaint.

Dated this 12th day of December, 2011.

By: 

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